# **EXHIBIT D**

# EXHIBIT D-1

### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

GARY B. FILLER and LAWRENCE PERLMAN, Trustees of the TRA Rights Trust,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., S.A.),

Defendants.

Civil Action No.: 04-10477 (PBS)

#### NOTICE OF DEPOSITION OF GREGORY P. JOSEPH

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30, Defendant Dexia Bank Belgium will take the deposition upon oral examination of Gregory P. Joseph at the offices of Clifford Chance US LLP, located at 31 West 52nd Street, New York, NY 10019, commencing on May 30, 2006 at 9:00 a.m., and continuing thereafter from day to day until completed, or on such dates as may be agreed by counsel. The deposition shall be recorded by stenographic and videographic means before an officer authorized by law to administer oaths. All parties are invited to attend and to participate in the manner provided for in the Federal Rules of Civil Procedure.

Dated: May 2, 2006

CLIFFORD CHANCE US LLP

James B. Weidner

Jeff E. Butler

31 West 52nd Street

New York, NY 10019-6131

Tel: (212) 878-8000

Fax: (212) 878-8375

MINTZ LEVIN COHN FERRIS GLOVSKY & **POPEO** 

Peter M. Saparoff (BBO#567379)

Breton Leone-Quick (BBO#391000)

One Financial Center

Boston, MA 02111

Tel:

(617) 542-6000

Fax:

(617) 542-2241

Counsel for Dexia Bank Belgium

### CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of Dexia Bank Belgium's Notice of Deposition to Gregory P. Joseph were served upon the following parties by facsimile and first class mail on May 2, 2006:

BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO Glen DeValerio

Jeffrey C. Block Patrick T. Egan

One Liberty Square

Boston, MA 02109

(617) 542-8300

Fax (617) 542-1194

SHALOV, STONE & BONNER LLP

Lee S. Shalov

James Bonner

Patrick L. Rocco

485 Seventh Avenue, Suite 100

New York, NY 10018

(212) 239-4340

Fax (212) 239-4310

CAULEY BOWMAN CARNEY & WILLIAMS, PLLC

Allen Carney

11001 Executive Center Drive, Suite 200

P.O. Box 25438

Little Rock, AR 72212

(501) 312-8500

Fax (501) 312-8505

Counsel for Class Plaintiffs

## BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Max W. Berger

Steven B. Singer

Javier Bleichmar

Avi Josefson

1285 Avenue of the Americas

New York, NY 10019

(212) 554-1400

Fax (212) 554-1444

Counsel for Plaintiffs Stonington Partners, Inc., Stonington Capital Appreciation 1994 Fund L.P.

and Stonington Holdings, L.L.C.

#### GREGORY P. JOSEPH LAW OFFICES LLC

Gregory P. Joseph

Susan M. Davies

805 Third Avenue, 31st Floor

New York, NY 10022

(212) 407-1200

Fax (212) 407-1299

Counsel for Plaintiffs Gary B. Filler and Lawrence Perlman,

Trustees for the TRA Rights Trust

## BOIES, SCHILLER & FLEXNER LLP

Karen C. Dyer

George R. Coe

255 South Orange Avenue, Suite 905

Orlando, FL 32801

(407) 425-7118

Fax (407) 425-7047

Counsel for Plaintiffs Janet Baker, James Baker, JKBaker LLC, and JMBaker LLC

Dated: May 2, 2006

NYA 779610.1

# EXHIBIT D-2

#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

STONINGTON PARTNERS, INC., a Delaware Corporation, STONINGTON CAPITAL APPRECIATION 1994 FUND L.P., a Delaware Partnership and STONINGTON HOLDINGS, L.L.C., a Delaware limited liability company,

Plaintiffs.

v.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., S.A.),

Defendants.

Civil Action No.: 04-10411 (PBS)

#### NOTICE OF DEPOSITION OF BERNSTEIN LITOWITZ BERGER & GROSSMAN LLP

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant Dexia Bank Belgium will take the deposition upon oral examination of Bernstein. Litowitz, Berger & Grossman LLP at the offices of Clifford Chance US LLP, located at 31 West 52nd Street, New York, NY 10019, commencing on May 31, 2006 at 9:00 a.m., and continuing thereafter from day to day until completed, or on such dates as may be agreed by counsel. Bernstein, Litowitz, Berger & Grossman LLP shall produce one or more officers, directors, managing agents, or other persons most knowledgeable regarding the topics listed in the attached Schedule A. The deposition shall be recorded by stenographic and videographic means before an officer authorized by law to administer oaths. All parties are invited to attend and to participate in the manner provided for in the Federal Rules of Civil Procedure.

Dated: May 2, 2006

CLIFFORD CHANCE US LLP

By:

James B. Weidner Jeff E. Butler

31 West 52nd Street

New York, NY 10019-6131

(212) 878-8000 (212) 878-8375 Fax:

MINTZ LEVIN COHN FERRIS GLOVSKY & **POPEO** 

> Peter M. Saparoff (BBO#567379) Breton Leone-Quick (BBO#391000)

One Financial Center Boston, MA 02111

(617) 542-6000 Tel: (617) 542-2241 Fax:

Counsel for Dexia Bank Belgium

#### SCHEDULE A

### **Definitions & Instructions**

- 1. "Plaintiffs" means the named plaintiffs in this action and each of their agents, attorneys, accountants, investigators or other representatives.
- 2. "Dexia" means Dexia Bank Belgium and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
- 3. "Artesia" means Artesia Banking Corporation, S.A. and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
  - 4. "L&H" means Lernout and Hauspie Speech Products, N.V.
- 5. The scope of these topics includes factual information concerning potentially relevant investigations by Plaintiffs including, without limitation, whether an investigation was done, when the investigation began started, what information prompted the investigation, who was involved in the investigation, what was done in connection with the investigation and identification of documents created in connection with the investigation.
  - 6. These topics relate to the time period from January 1, 2000 to June 23, 2003.

### <u>Topics</u>

- Any investigation by Plaintiffs which was directed in any way to the activities of 1. Dexia or Artesia specifically.
- Any investigation by Plaintiffs which was directed in any way to the activities of 2. a bank, banks, banking corporations, or banking institutions in connection with the L&H fraud.
- Any other investigation upon which Plaintiffs intend to rely on to demonstrate 3. that they exercised reasonable diligence in investigating potential claims against Dexia or Artesia.

## CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of Dexia Bank Belgium's Notice of Deposition to Bernstein, Litowitz, Berger & Grossman LLP were served upon the following parties by facsimile and first class mail on May 2, 2006:

BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO Glen De Valerio Jeffrey C. Block Patrick T. Egan One Liberty Square Boston, MA 02109 (617) 542-8300 Fax (617) 542-1194

SHALOV, STONE & BONNER LLP Lee S. Shalov James Bonner Patrick L. Rocco 485 Seventh Avenue, Suite 100 New York, NY 10018 (212) 239-4340 Fax (212) 239-4310

CAULEY BOWMAN CARNEY & WILLIAMS, PLLC Allen Carney 11001 Executive Center Drive, Suite 200 P.O. Box 25438 Little Rock, AR 72212 (501) 312-8500 Fax (501) 312-8505 Counsel for Class Plaintiffs

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Max W. Berger
Steven B. Singer
Javier Bleichmar
Avi Josefson
1285 Avenue of the Americas
New York, NY 10019
(212) 554-1400
Fax (212) 554-1444
Counsel for Plaintiffs Stonington Partners, Inc.,
Stonington Capital Appreciation 1994 Fund L.P.
and Stonington Holdings, L.L.C.

GREGORY P. JOSEPH LAW OFFICES LLC

Gregory P. Joseph
Susan M. Davies
805 Third Avenue, 31st Floor
New York, NY 10022
(212) 407-1200
Fax (212) 407-1299
Counsel for Plaintiffs Gary B. Filler and Lawrence Perlman,
Trustees for the TRA Rights Trust

BOIES, SCHILLER & FLEXNER LLP

Karen C. Dyer George R. Coe 255 South Orange Avenue, Suite 905 Orlando, FL 32801 (407) 425-7118 Fax (407) 425-7047

Counsel for Plaintiffs Janet Baker, James Baker, JKBaker LLC, and JMBaker LLC

Dated: May 2, 2006

Kara Morrow

# EXHIBIT D-3

#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JANET BAKER and JAMES BAKER, JKBAKER LLC and JMBAKER LLC,

Plaintiffs,

V.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., S.A.),

Defendants.

Civil Action No.: 04-10501 (PBS)

#### NOTICE OF DEPOSITION OF BOIES SCHILLER & FLEXNER LLP

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6). Defendant Dexia Bank Belgium will take the deposition upon oral examination of Boies Schiller & Flexner LLP at the offices of Mintz Levin Cohn Ferris Glovsky & Popeo, located at One Financial Center, Boston, MA 02111, commencing on June 1, 2006 at 9:00 a.m., and continuing thereafter from day to day until completed, or on such dates as may be agreed by counsel. Boies Schiller & Flexner LLP shall produce one or more officers, directors, managing agents, or other persons most knowledgeable regarding the topics listed in the attached Schedule A. The deposition shall be recorded by stenographic and videographic means before an officer authorized by law to administer oaths. All parties are invited to attend and to participate in the manner provided for in the Federal Rules of Civil Procedure.

Dated: May 2, 2006

CLIFFORD CHANCE US LLP

James B. Weidner

Jeff E. Butler

31 West 52nd Street

New York, NY 10019-6131

(212) 878-8000

Fax: (212) 878-8375

MINTZ LEVIN COHN FERRIS GLOVSKY & **POPEO** 

Peter M. Saparoff (BBO#567379)

Breton Leone-Quick (BBO#391000)

One Financial Center

Boston, MA 02111

(617) 542-6000 Tel:

(617) 542-2241 Fax:

Counsel for Dexia Bank Belgium

#### SCHEDULE A

## Definitions & Instructions

- "Plaintiffs" means the named plaintiffs in this action and each of their agents, 1. attorneys, accountants, investigators or other representatives.
- 2. "Dexia" means Dexia Bank Belgium and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
- "Artesia" means Artesia Banking Corporation, S.A. and its parents, affiliates, 3. divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
  - 4. "L&H" means Lemout and Hauspie Speech Products, N.V.
- 5. The scope of these topics includes factual information concerning potentially relevant investigations by Plaintiffs including, without limitation, whether an investigation was done, when the investigation began started, what information prompted the investigation, who was involved in the investigation, what was done in connection with the investigation and identification of documents created in connection with the investigation.
  - 6. These topics relate to the time period from January 1, 2000 to June 23, 2003.

### **Topics**

- Any investigation by Plaintiffs which was directed in any way to the activities of l. Dexia or Artesia specifically.
- Any investigation by Plaintiffs which was directed in any way to the activities of 2. a bank, banking corporations, or banking institutions in connection with the L&H fraud.
- Any other investigation upon which Plaintiffs intend to rely on to demonstrate 3. that they exercised reasonable diligence in investigating potential claims against Dexia or Artesia.

### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of Dexia Bank Belgium's Notice of Deposition to Boies Schiller & Flexner LLP were served upon the following parties by facsimile and first class mail on May 2, 2006:

BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO

Glen DeValerio Jeffrey C. Block Patrick T. Egan One Liberty Square Boston, MA 02109 (617) 542-8300 Fax (617) 542-1194

SHALOV, STONE & BONNER LLP Lee S. Shalov James Bonner Patrick L. Rocco 485 Seventh Avenue, Suite 100 New York, NY 10018 (212) 239-4340 Fax (212) 239-4310

CAULEY BOWMAN CARNEY & WILLIAMS, PLLC Allen Carney 11001 Executive Center Drive, Suite 200 P.O. Box 25438 Little Rock, AR 72212 (501) 312-8500 Fax (501) 312-8505 Counsel for Class Plaintiffs

## BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Max W. Berger
Steven B. Singer
Javier Bleichmar
Avi Josefson
1285 Avenue of the Americas
New York, NY 10019
(212) 554-1400
Fax (212) 554-1444
Counsel for Plaintiffs Stonington Partners, Inc.,
Stonington Capital Appreciation 1994 Fund L.P.
and Stonington Holdings, L.L.C.

#### GREGORY P. JOSEPH LAW OFFICES LLC

Gregory P. Joseph
Susan M. Davies
805 Third Avenue, 31st Floor
New York, NY 10022
(212) 407-1200
Fax (212) 407-1299
Counsel for Plaintiffs Gary B. Filler and Lawrence Perlman,
Trustees for the TRA Rights Trust

## BOIES, SCHILLER & FLEXNER LLP

Karen C. Dyer George R. Coe 255 South Orange Avenue, Suite 905 Orlando, FL 32801 (407) 425-7118 Fax (407) 425-7047

Counsel for Plaintiffs Janet Baker, James Baker, JKBaker LLC. and JMBaker LLC

Dated: May 2, 2006

Kara Morrow

# EXHIBIT D-4

### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

HANS A. QUAAK, ATTILIO PO and KARL LEIBINGER, on behalf of themselves and those similarly situated,

Plaintiffs,

ν.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., S.A.),

Defendants.

Civil Action No.: 03-11566 (PBS)

#### NOTICE OF DEPOSITION OF CAULEY BOWMAN CARNEY & WILLIAMS PLLC

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant Dexia Bank Belgium will take the deposition upon oral examination of Cauley Bowman Carney & Williams PLLC at the offices of Mintz Levin Cohn Ferris Glovsky & Popeo, located at One Financial Center, Boston, MA 02111, commencing on June 2, 2006 at 9:00 a.m., and continuing thereafter from day to day until completed, or on such dates as may be agreed by counsel. Cauley Bowman Carney & Williams PLLC shall produce one or more officers, directors, managing agents, or other persons most knowledgeable regarding the topics listed in the attached Schedule A. The deposition shall be recorded by stenographic and videographic means before an officer authorized by law to administer oaths. All parties are invited to attend and to participate in the manner provided for in the Federal Rules of Civil Procedure.

Dated: May 2, 2006

CLIFFORD CHANCE US LLP

James B. Weidner

Jeff E. Butler

31 West 52nd Street

New York, NY 10019-6131

Tel: (212) 878-8000

Fax: (212) 878-8375

MINTZ LEVIN COHN FERRIS GLOVSKY & **POPEO** 

> Peter M. Saparoff (BBO#567379) Breton Leone-Quick (BBO#391000)

One Financial Center

Boston, MA 02111

(617) 542-6000

Fax:

(617) 542-2241

Counsel for Dexia Bank Belgium

#### SCHEDULE A

#### Definitions & Instructions

- 1. "Plaintiffs" means the named plaintiffs in this action and each of their agents. attorneys, accountants, investigators or other representatives.
- 2. "Dexia" means Dexia Bank Belgium and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
- 3. "Artesia" means Artesia Banking Corporation, S.A. and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
  - 4. "L&H" means Lernout and Hauspie Speech Products, N.V.
- 5. The scope of these topics includes factual information concerning potentially relevant investigations by Plaintiffs including, without limitation, whether an investigation was done, when the investigation began started, what information prompted the investigation, who was involved in the investigation, what was done in connection with the investigation and identification of documents created in connection with the investigation.
  - б. These topics relate to the time period from January 1, 2000 to June 23, 2003.

## **Topics**

- 1. Any investigation by Plaintiffs which was directed in any way to the activities of Dexia or Artesia specifically.
- 2. Any investigation by Plaintiffs which was directed in any way to the activities of a bank, banks, banking corporations, or banking institutions in connection with the L&H fraud.
- 3. Any other investigation upon which Plaintiffs intend to rely on to demonstrate that they exercised reasonable diligence in investigating potential claims against Dexia or Artesia.

## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of Dexia Bank Belgium's Notice of Deposition to Cauley Bowman Carney & Williams PLLC were served upon the following parties by facsimile and first class mail on May 2, 2006:

BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO

Glen DeValerio Jeffrey C. Block Patrick T. Egan One Liberty Square Boston, MA 02109 (617) 542-8300 Fax (617) 542-1194

SHALOV, STONE & BONNER LLP

Lee S. Shalov James Bonner Patrick L. Rocco 485 Seventh Avenue, Suite 100 New York, NY 10018 (212) 239-4340 Fax (212) 239-4310

CAULEY BOWMAN CARNEY & WILLIAMS, PLLC Allen Carney 11001 Executive Center Drive, Suite 200 P.O. Box 25438 Little Rock, AR 72212 (501) 312-8500 Fax (501) 312-8505 Counsel for Class Plaintiffs

### BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Max W. Berger
Steven B. Singer
Javier Bleichmar
Avi Josefson
1285 Avenue of the Americas
New York, NY 10019
(212) 554-1400
Fax (212) 554-1444
Counsel for Plaintiffs Stonington Partners, Inc.,
Stonington Capital Appreciation 1994 Fund L.P.
and Stonington Holdings, L.L.C.

## GREGORY P. JOSEPH LAW OFFICES LLC

Gregory P. Joseph
Susan M. Davies
805 Third Avenue, 31st Floor
New York, NY 10022
(212) 407-1200
Fax (212) 407-1299
Counsel for Plaintiffs Gary B. Filler and Lawrence Perlman,
Trustees for the TRA Rights Trust

## BOIES, SCHILLER & FLEXNER LLP

Karen C. Dyer George R. Coe 255 South Orange Avenue, Suite 905 Orlando, FL 32801 (407) 425-7118 Fax (407) 425-7047

Counsel for Plaintiffs Janet Baker, James Baker, JKBaker LLC, and JMBaker LLC

Dated: May 2, 2006

# EXHIBIT D-5

### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

HANS A. QUAAK, ATTILIO PO and KARL LEIBINGER, on behalf of themselves and those similarly situated.

Plaintiffs,

٧.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., S.A.),

Defendants.

Civil Action No.: 03-11566 (PBS)

## NOTICE OF DEPOSITION OF BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant Dexia Bank Belgium will take the deposition upon oral examination of Berman DeValerio Pease Tabacco Burt & Pucillo at the offices of Mintz Levin Cohn Ferris Glovsky & Popeo, located at One Financial Center, Boston, MA 02111, commencing on June 5, 2006 at 9:00 a.m., and continuing thereafter from day to day until completed, or on such dates as may be agreed by counsel. Berman DeValerio Pease Tabacco Burt & Pucillo shall produce one or more officers, directors, managing agents, or other persons most knowledgeable regarding the topics listed in the attached Schedule A. The deposition shall be recorded by stenographic and videographic means before an officer authorized by law to administer oaths. All parties are invited to attend and to participate in the manner provided for in the Federal Rules of Civil Procedure.

Dated: May 2, 2006

CLIFFORD CHANCE US LLP

James B. Weidner

Jeff E. Butler

31 West 52nd Street

New York, NY 10019-6131

Tel:

(212) 878-8000

Fax:

(212) 878-8375

MINTZ LEVIN COHN FERRIS GLOVSKY & POPEO

Peter M. Saparoff (BBO#567379)

Breton Leone-Quick (BBO#391000)

One Financial Center

Boston, MA 02111

Tel:

(617) 542-6000

Fax:

(617) 542-2241

Counsel for Dexia Bank Belgium

#### SCHEDULE A

#### <u>Definitions & Instructions</u>

- 1. "Plaintiffs" means the named plaintiffs in this action and each of their agents, attorneys, accountants, investigators or other representatives.
- 2. "Dexia" means Dexia Bank Belgium and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
- 3. "Artesia" means Artesia Banking Corporation, S.A. and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
  - 4. "L&H" means Lernout and Hauspie Speech Products, N.V.
- 5. The scope of these topics includes factual information concerning potentially relevant investigations by Plaintiffs including, without limitation, whether an investigation was done, when the investigation began started, what information prompted the investigation, who was involved in the investigation, what was done in connection with the investigation and identification of documents created in connection with the investigation.
  - 6. These topics relate to the time period from January 1, 2000 to June 23, 2003.

### **Topics**

- Any investigation by Plaintiffs which was directed in any way to the activities of 1. Dexia or Artesia specifically.
- Any investigation by Plaintiffs which was directed in any way to the activities of 2. a bank, banks, banking corporations, or banking institutions in connection with the L&H fraud.
- 3. Any other investigation upon which Plaintiffs intend to rely on to demonstrate that they exercised reasonable diligence in investigating potential claims against Dexia or Artesia.

### **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of Dexia Bank Belgium's Notice of Deposition to Berman DeValerio Pease Tabacco Burt & Pucillo were served upon the following parties by facsimile and first class mail on May 2, 2006:

BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO Glen DeValerio Jeffrey C. Block Patrick T. Egan One Liberty Square Boston, MA 02109 (617) 542-8300 Fax (617) 542-1194

SHALOV, STONE & BONNER LLP Lee S. Shalov James Bonner Patrick L. Rocco 485 Seventh Avenue, Suite 100 New York, NY 10018 (212) 239-4340 Fax (212) 239-4310

CAULEY BOWMAN CARNEY & WILLIAMS, PLLC Allen Carney
11001 Executive Center Drive, Suite 200
P.O. Box 25438
Little Rock, AR 72212
(501) 312-8500
Fax (501) 312-8505
Counsel for Class Plaintiffs

### BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Max W. Berger
Steven B. Singer
Javier Bleichmar
Avi Josefson
1285 Avenue of the Americas
New York, NY 10019
(212) 554-1400
Fax (212) 554-1444
Counsel for Plaintiffs Stonington Partners, Inc.,
Stonington Capital Appreciation 1994 Fund L.P.
and Stonington Holdings, L.L.C.

#### GREGORY P. JOSEPH LAW OFFICES LLC

Gregory P. Joseph
Susan M. Davies
805 Third Avenue, 31st Floor
New York, NY 10022
(212) 407-1200
Fax (212) 407-1299
Counsel for Plaintiffs Gary B. Filler and Lawrence Perlman,
Trustees for the TRA Rights Trust

#### BOIES, SCHILLER & FLEXNER LLP

Karen C. Dyer George R. Coe 255 South Orange Avenue, Suite 905 Orlando, FL 32801 (407) 425-7118 Fax (407) 425-7047

Counsel for Plaintiffs Janet Baker, James Baker, JKBaker LLC, and JMBaker LLC

Dated: May 2, 2006

# EXHIBIT D-6

### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

HANS A. QUAAK, ATTILIO PO and KARL LEIBINGER, on behalf of themselves and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., S.A.),

Defendants.

Civil Action No.: 03-11566 (PBS)

## NOTICE OF DEPOSITION OF SHALOV STONE & BONNER LLP

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6), Defendant Dexia Bank Belgium will take the deposition upon oral examination of Shalov, Stone & Bonner LLP at the offices of Clifford Chance US LLP, located at 31 West 52nd Street, New York, NY 10019, commencing on June 8, 2006 at 9:00 a.m., and continuing thereafter from day to day until completed, or on such dates as may be agreed by counsel. Shalov Stone & Bonner LLP shall produce one or more officers, directors, managing agents, or other persons most knowledgeable regarding the topics listed in the attached Schedule A. The deposition shall be recorded by stenographic and videographic means before an officer authorized by law to administer oaths. All parties are invited to attend and to participate in the manner provided for in the Federal Rules of Civil Procedure.

Dated: May 2, 2006

CLIFFORD CHANCE US LLP

James B. Weidner

Jeff E. Butler

31 West 52nd Street

New York, NY 10019-6131

(212) 878-8000

Fax:

(212) 878-8375

MINTZ LEVIN COHN FERRIS GLOVSKY & POPEO

Peter M. Saparoff (BBO#567379)

Breton Leone-Quick (BBO#391000)

One Financial Center

Boston, MA 02111

Tel:

(617) 542-6000

(617) 542-2241

Counsel for Dexia Bank Belgium

#### SCHEDULE A

## <u>Definitions & Instructions</u>

- 1. "Plaintiffs" means the named plaintiffs in this action and each of their agents, attorneys, accountants, investigators or other representatives.
- 2. "Dexia" means Dexia Bank Belgium and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
- 3. "Artesia" means Artesia Banking Corporation, S.A. and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
  - 4. "L&H" means Lernout and Hauspie Speech Products, N.V.
- 5. The scope of these topics includes factual information concerning potentially relevant investigations by Plaintiffs including, without limitation, whether an investigation was done, when the investigation began started, what information prompted the investigation, who was involved in the investigation, what was done in connection with the investigation and identification of documents created in connection with the investigation.
  - 6. These topics relate to the time period from January 1, 2000 to June 23, 2003.

# **Topics**

- Any investigation by Plaintiffs which was directed in any way to the activities of 1. Dexia or Artesia specifically.
- Any investigation by Plaintiffs which was directed in any way to the activities of 2. a bank, banks, banking corporations, or banking institutions in connection with the L&H fraud.
- 3. Any other investigation upon which Plaintiffs intend to rely on to demonstrate that they exercised reasonable diligence in investigating potential claims against Dexia or Artesia.

## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of Dexia Bank Belgium's Notice of Deposition to Shalov Stone & Bonner LLP were served upon the following parties by facsimile and first class mail on May 2, 2006:

BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO

Glen DeValerio Jeffrey C. Block Patrick T. Egan One Liberty Square Boston, MA 02109 (617) 542-8300 Fax (617) 542-1194

SHALOV, STONE & BONNER LLP Lee S. Shalov James Bonner Patrick L. Rocco 485 Seventh Avenue, Suite 100 New York, NY 10018 (212) 239-4340 Fax (212) 239-4310

CAULEY BOWMAN CARNEY & WILLIAMS, PLLC Allen Carney 11001 Executive Center Drive, Suite 200 P.O. Box 25438 Little Rock, AR 72212 (501) 312-8500 Fax (501) 312-8505 Counsel for Class Plaintiffs BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Max W. Berger
Steven B. Singer
Javier Bleichmar
Avi Josefson
1285 Avenue of the Americas
New York, NY 10019
(212) 554-1400
Fax (212) 554-1444
Counsel for Plaintiffs Stonington Partners, Inc.,
Stonington Capital Appreciation 1994 Fund L.P.
and Stonington Holdings, L.L.C.

GREGORY P. JOSEPH LAW OFFICES LLC

Gregory P. Joseph
Susan M. Davies
805 Third Avenue, 31st Floor
New York, NY 10022
(212) 407-1200
Fax (212) 407-1299
Counsel for Plaintiffs Gary B. Filler and Lawrence Perlman,
Trustees for the TRA Rights Trust

BOIES, SCHILLER & FLEXNER LLP

Karen C. Dyer George R. Coe 255 South Orange Avenue, Suite 905 Orlando, FL 32801 (407) 425-7118 Fax (407) 425-7047

Counsel for Plaintiffs Janet Baker, James Baker, JKBaker LLC, and JMBaker LLC

Dated: May 2, 2006

Kara Morross

# EXHIBIT D-7

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

HANS A. QUAAK, ATTILIO PO and KARL LEIBINGER, on behalf of themselves and those similarly situated,

Plaintiffs,

v.

DEXIA, S.A. and DEXIA BANK BELGIUM (formerly known as ARTESIA BANKING CORP., S.A.),

Defendants.

Civil Action No.: 03-11566 (PBS)

## NOTICE OF DEPOSITION OF JAMES MINTZ GROUP INC.

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30(b)(6),
Defendant Dexia Bank Belgium will take the deposition upon oral examination of James Mintz
Group Inc. at the offices of Clifford Chance US LLP, located at 31 West 52nd Street, New York,
NY 10019, commencing on June 7, 2006 at 9:00 a.m., and continuing thereafter from day to day
until completed, or on such dates as may be agreed by counsel. James Mintz Group Inc. shall
produce one or more officers, directors, managing agents, or other persons most knowledgeable
regarding the topics listed in the attached Schedule A. The deposition shall be recorded by
stenographic and videographic means before an officer authorized by law to administer oaths.
All parties are invited to attend and to participate in the manner provided for in the Federal Rules
of Civil Procedure.

Dated: May 5, 2006

CLIFFORD CHANCE US LLP

Bv:

James B. Weidner

Jeff E. Butler

31 West 52nd Street

New York, NY 10019-6131

Tel: (212) 878-8000 Fax: (212) 878-8375

MINTZ LEVIN COHN FERRIS GLOVSKY & POPEO

Peter M. Saparoff (BBO#567379) Breton Leone-Quick (BBO#391000)

One Financial Center

Boston, MA 02111 Tel: (617) 542-6

Tel: (617) 542-6000 Fax: (617) 542-2241

Counsel for Dexia Bank Belgium

#### SCHEDULE A

## Definitions & Instructions

- 1. "Plaintiffs" means the named plaintiffs in this action and the named plaintiffs in the following related cases pending in the District of Massachusetts: *Stonington Partners, Inc. v. Dexia S.A.*, No. 04-10411-PBS; *Filler v. Dexia S.A.*, No. 04-10477-PBS; and *Baker v. Dexia*, *S.A.*, No. 04-10501-PBS.
- 2. "Dexia" means Dexia Bank Belgium and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
- 3. "Artesia" means Artesia Banking Corporation, S.A. and its parents, affiliates, divisions, subsidiaries, predecessors or successors in interest, including present or former officers, directors, administrators, employees, agents, attorneys, accountants, investigators, or any other representatives.
  - 4. "L&H" means Lernout and Hauspie Speech Products, N.V.
- 5. The scope of these topics includes factual information concerning potentially relevant investigations by Plaintiffs including, without limitation, whether an investigation was done, when the investigation began started, what information prompted the investigation, who was involved in the investigation, what was done in connection with the investigation and identification of documents created in connection with the investigation.
  - 6. These topics relate to the time period from January 1, 2000 to June 23, 2003.

## **Topics**

- 1. Any investigation done at the request of Plaintiffs or their counsel which was directed in any way to the activities of Dexia or Artesia specifically.
- 2. Any investigation done at the request of Plaintiffs or their counsel which was directed in any way to the activities of a bank, banks, banking corporations, or banking institutions in connection with the L&H fraud.

## **CERTIFICATE OF SERVICE**

I hereby certify that true and correct copies of Dexia Bank Belgium's Notice of Deposition to James Mintz Group Inc. were served upon the following parties by facsimile and first class mail on May 5, 2006:

BERMAN DEVALERIO PEASE TABACCO BURT & PUCILLO

Glen DeValerio Jeffrey C. Block Patrick T. Egan One Liberty Square Boston, MA 02109 (617) 542-8300 Fax (617) 542-1194

SHALOV, STONE & BONNER LLP

Lee S. Shalov James Bonner Patrick L. Rocco 485 Seventh Avenue, Suite 100 New York, NY 10018 (212) 239-4340 Fax (212) 239-4310

CAULEY BOWMAN CARNEY & WILLIAMS, PLLC

Allen Carney
11001 Executive Center Drive, Suite 200
P.O. Box 25438
Little Rock, AR 72212
(501) 312-8500
Fax (501) 312-8505
Counsel for Class Plaintiffs

## BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

Max W. Berger
Steven B. Singer
Javier Bleichmar
Avi Josefson
1285 Avenue of the Americas
New York, NY 10019
(212) 554-1400
Fax (212) 554-1444
Counsel for Plaintiffs Stonington Partners, Inc.,
Stonington Capital Appreciation 1994 Fund L.P.
and Stonington Holdings, L.L.C.

## GREGORY P. JOSEPH LAW OFFICES LLC

Gregory P. Joseph
Susan M. Davies
805 Third Avenue, 31st Floor
New York, NY 10022
(212) 407-1200
Fax (212) 407-1299
Counsel for Plaintiffs Gary B. Filler and Lawrence Perlman,
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## BOIES, SCHILLER & FLEXNER LLP

Karen C. Dyer George R. Coe 255 South Orange Avenue, Suite 905 Orlando, FL 32801 (407) 425-7118 Fax (407) 425-7047

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Dated: May 5, 2006

Kara Morrow